

EXHIBIT 152

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

DECLARATION OF ALFRED MATHEWSON AND SERGIO PAREJA, CO-DEANS OF THE
UNIVERSITY OF NEW MEXICO SCHOOL OF LAW

Pursuant to 28 U.S.C. Sec. 1746, I, Alfred Mathewson, hereby declare:

1. I am over the age of 18 and competent to testify.
2. I was named one of two co-deans of the University of New Mexico (UNM) School of Law in August 2015.
3. I joined the UNM law faculty in 1983 after working as a corporate, securities and banking lawyer in Denver.

4. From 1997 through 2002, I was Associate Dean of Academic Affairs, overseeing the Law School curriculum, clinical law program, faculty appointments, the faculty promotion and tenure process, library, faculty development and related issues. I directed the UNM Africana Studies program from 2009 through 2014.

Pursuant to 28 U.S.C. Sec. 1746 I, Sergio Pareja, hereby declare:

5. I am over the age of 18 and competent to testify.

6. I was named one of two co-deans of the UNM School of Law in August 2015.

7. My career includes nearly nine years in private practice in Colorado and Indiana, including work as a partner in the tax department of a large Denver law firm prior to my tenure at the UNM School of Law.

8. In practice I specialized in federal individual and corporate income tax planning, state and local tax matters, and estate and gift tax planning. These subjects remain the focus of my teaching and scholarly activities.

JOINT CONCERNS OF THE CO-DEANS

9. As the two co-deans of UNM Law School, the only law school in the State of New Mexico, we and our faculty colleagues have consistently and proudly strengthened the diversity of our student body, including diversity of national origin.

10. We regularly admit a cohort of 110 - 120 first-year law students to join a student body totaling approximately 350 students. Our longstanding policy has been to do so without regard to immigration status. This is consonant with our core values of diversity and inclusion on the basis of gender, race, religion, nationality, sexual orientation, physical ability, class background, and political opinion. Such diversity enriches the teaching and learning experience for all our

faculty and students. It also helps ensure that UNM School of Law graduates will have the cultural and legal skills to serve the needs of our diverse state, nation, and world.

11. Our non-discriminatory admissions policy is also required by New Mexico State law, NMSA 1978, Sec. 21-1-4.6. New Mexico post-secondary institutions are prohibited from discriminating on the basis of immigration status. Thus it is our legal duty and our educational mission to ensure that we help all our students succeed academically, professionally, and personally, regardless of citizenship or immigration status.

12. The Law School plays a significant role in the New Mexico legal system. The dean is designated by the constitution of the State of New Mexico to chair the judicial selection process, and by statute to chair the Judicial Compensation Commission. The Law School also has primary responsibility for all judicial education in New Mexico.

13. The School of Law's academic program includes the opportunity to pursue a Joint Degree in Law and Latin American Studies, as well as opportunities to study abroad.

14. We offer exchange programs in Mexico, Canada, and Australia (Tasmania).

15. In addition, the Law School conducts a summer law program in Spain, where we administer the UNM School of Law Program in Madrid, and has been a member of consortium of law schools for a summer program in Guanajuato, Mexico.

16. Because New Mexico shares a border with Mexico, we have established a close relationship with Mexican attorneys, working together to resolve disputes in the areas of international, immigration, and refugee law.

17. Our tuition for the 2017-18 academic year is just over \$16,500 for in-state and \$36,000 for non-residents, making the UNM School of Law an economically accessible opportunity for students.

18. The educational programs and careers of some UNM Law School students may be interrupted if the Deferred Action on Childhood Arrivals (DACA) program is rescinded or limited.

19. If DACA is rescinded or limited, some of our students and other members of their families may face a heightened risk of removal from the United States, or potentially lose employment and/or career opportunities.

20. In September 2017, our Law School organized a Teach-In on the proposed DACA rescission for students, faculty, staff and families. A panel of faculty, staff and local attorneys discussed the impact of the DACA rescission. Panelists and guests expressed and acknowledged the insecurity that certain members of our community face with regard to their legal status, economic livelihood, and emotional health.

21. Our law school community is founded on principles of fairness, due process, equity, and free expression. We also pride ourselves in the mutual respect and compassion we show to one another. We value diversity in multiple dimensions, including political opinion, race and ethnic background, and national origin. The celebration of such diversity is our heritage as a state that shares a national border with Mexico and includes 23 recognized indigenous tribes and nations. The preservation of such diversity is essential to the continuing mission of the UNM School of Law to educate future lawyers who will increase access to justice locally, nationally, and internationally.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26th day of September 2017.

A handwritten signature in black ink, appearing to read "Alfred Mathewson", with a long horizontal flourish extending to the right.

Alfred Mathewson
Dean and Professor of Law
UNM School of Law
1117 Stanford NE
Albuquerque, NM 87131

A handwritten signature in black ink, appearing to read "Sergio Pareja", with a stylized, cursive script.

Sergio Pareja
Dean and Professor of Law
UNM School of Law
1117 Stanford NE
Albuquerque NM 87131